

UNITED STATES COURT OF APPEALS  
FOR THE DISTRICT OF COLUMBIA CIRCUIT

No. 25-5152  
(C.A. No. 25-0943)

COALITION FOR HUMANE  
IMMIGRANT RIGHTS, *et al.*

Appellants,

v.

U.S. DEPARTMENT OF HOMELAND  
SECURITY, *et al.*,

Appellees.

**APPELLEES' CONSENT MOTION TO EXTEND  
TIME TO FILE RESPONSE**

Pursuant to Circuit Rule 27, Appellees respectfully move the Court for an extension of time to file an opposition to Appellants' Motion for Stay or Injunction (Doc. No. 2114110), filed on May 2, 2025. Appellees seek an extension of time up to and including May 22, 2025—to file their opposition. Undersigned counsel for Appellees contacted counsel for Appellants to obtain their position on the relief being sought; Appellants, by and through counsel, consent to the relief requested herein, on the condition that the deadline for their reply be moved to June 3, 2025.

There is good cause to grant this request for ten additional days to respond to Appellants' motion. The United States Attorney's Office for the District of Columbia represented Appellees in the District Court matter from which Appellants appealed, and they continue to do so with respect to Appellants' pending motion for

a stay or injunction pending appeal before the District Court. However, undersigned counsel for Appellees had been informed that a different Department of Justice component would be handling this appeal and was informed only the day after the response was due (May 13, 2025), that the United States Attorney's Office would also represent Appellees in this appeal, rather than other attorneys within the Department of Justice. Undersigned counsel has therefore acted as promptly as possible in conferring with Appellants' counsel about this extension and in filing this motion. Undersigned counsel needs a reasonable amount of additional time prepare Appellees' opposition, coordinate efforts with respective agency counsel within each of the Appellee agencies, and have the opposition reviewed internally prior to filing as required by Department of Justice regulations.

This is Appellees' first request to extend a deadline in this appeal. This motion is being filed in good faith and not for purposes of gaining any unfair advantage through delay. Granting this motion will neither unfairly prejudice Appellants nor unduly delay the Court's resolution of this matter. Moreover, as the pending motion relates exclusively to an injunction or stay pending the ultimate resolution of Appellees' appeal, and as the pending motion parallels a motion already pending before the District Court, the effect of the short extension sought herein is minimal.

WHEREFORE, Appellees, by and through undersigned counsel, respectfully request that the Court grant this motion and extend until May 22, 2025, the time for Appellees to file their opposition to Appellants' Motion for Stay or Injunction.

Respectfully submitted,

JEANINE FERRIS PIRRO  
United States Attorney

BRIAN P. HUDA  
JANE M. LYONS  
Assistant United States Attorneys

/s/ Kartik N. Venguswamy  
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**CERTIFICATE OF COMPLIANCE**  
**(FRAP 27(d)(2)(A))**

I hereby certify that the text of Appellees' Motion to Extend Time to File Response was prepared using 14-point Times New Roman font, and it contains 400 words, as counted by Microsoft Word.

*/s/ Kartik N. Venguswamy*  
Kartik N. Venguswamy  
Assistant United States Attorney

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 14th day of May, 2025, Appellees' Consent Motion To Extend Time To File Response will be served by electronic mail to:

Michelle Lapointe  
Emma Winger  
Christopher Opila  
AMERICAN IMMIGRATION COUNCIL  
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*/s/ Kartik N. Venguswamy*  
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